NOTE: THIS IS A SAMPLE TRAINING PLAN. THIS PLAN IS MEANT ONLY TO BE A GUIDE IN PREPARING YOUR OWN COMPANY-SPECIFIC TRAINING PLAN.

City of Seattle
Engineering Department
Dangerous Waste Management
Training Program

Prepared for Transportation Division Employees Responsible For The Management of Department Generated Hazardous Wastes

March 21, 1994

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Dangerous Waste Reduction

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#### **Section 1**

# **Inventory/Warehouse Management of Dangerous Wastes Generated by the Seattle Engineering Department (SED)**

- 1.1 This training plan has been developed to aid in the safe and efficient management of SED's dangerous wastes, and to ensure compliance with State Dangerous Waste Regulations.
- 1.2 This plan will be reviewed and updated annually by the Warehouse Supervisor and Hazardous Materials Warehouser.
- 1.3 Because of the complexity of the regulations and recordkeeping requirements, Inventory/Warehouse shall have primary responsibility for the handling and subsequent-' recordkeeping for SED-generated dangerous wastes.
- 1.3.1 All Inventory/Warehouse and Street Maintenance staff who are involved in any aspect of dangerous waste management shall fall under this plan.
- 1.4 The Hazardous Materials Warehouser will administer the dangerous waste management program and shall receive 40 hours of classroom training in a WISHA-approved course in first response or personnel protection and safety, in accordance to WAC 296-62. An eight-hour refresher course must then be completed annually to maintain certification. Other warehouse or tool room personnel engaged in dangerous waste activities can then, through on-the-job training from the Hazardous Materials Warehouser, be trained in the procedures outlined in this training plan. All staff involved in dangerous waste activities must review this training program annually.
- 1.4.1 In the absence of a trained, full-time permanent Hazardous Materials Warehouser, the Warehouse Supervisor will either administer the dangerous waste management program or appoint am already trained staff member to do so. That person shall be known as the designated dangerous waste management specialist
- 1.5 It is Department policy that all SED employees shall maintain current certification in first aid and cardiopulmonary resuscitation (CPR) and will be recertified every three years (responsibility of Trans-Ops Safety Office).

### **Section 2**

# JOB DESCRIPTIONS & DANGEROUS WASTE MANAGEMENT TRAINING REQUIREMENTS

2-1 The Warehouse Supervisor is responsible for the daily Inventory/Warehouse operations, and as such, supervises all dangerous waste management activities at the SED Warehouses. In the absence of a trained Hazardous Materials (Haz Mat) Warehouser, s/he must assume or assign someone on the Inventory/Warehouse staff to serve as the Dangerous Waste Management Specialist. The Warehouse Supervisor must be thoroughly knowledgeable of the dangerous waste management procedures outlined in this plan.

**SEE ATTACHEMENT 1** 

2.2 Senior Warehousers at both warehouses are sometimes called upon to assist with the disposal of dangerous wastes- As such, they should be thoroughly knowledgeable of these procedures and shall be trained either by the Haz Mat Warehouser or the designated dangerous waste management specialist.

2.2-1 Job Description follows: See Attachment 2

2-3 The Haz Mat Warehouser administers the dangerous waste management/disposal program and should have training above and beyond the procedures in this plan. The person in this position must be familiar with state dangerous waste regulations and must be able to train other warehouse or tool room staff in the proper management of dangerous wastes. The Haz Mat Warehouser is also responsible for training others in the procedures outlined in this training plan. A 40-hour Hazardous Operations (HAZWOPER) course must be completed within six months of being hired, with 8-hour annual refresher training as additional requirements for this position.

2.3.1 Job description follows: See Attachment 3

- 2.4 In the absence of a permanent Hazardous Materials Warehouser, the Warehouse Supervisor will either assume or delegate dangerous waste management responsibilities. If delegated, the person responsible will assume the role of Dangerous Waste Management Specialist. It is suggested that the Dangerous Waste Management Specialist have the same job training requirements as the Haz Mat Warehouser, since they will be responsible for training all others in these dangerous waste management procedures.
- 2-4.1 There is no City of Seattle job classification for this position. The person in this role is assuming dangerous waste management responsibilities in addition to their regular job duties.
- 2.5 All Warehousers at both warehouses will assist the Haz Mat Warehouser in handling dangerous wastes— They must be trained thoroughly in the procedures in this plan through on-the-job training by either the Haz Mat Warehouser or the designated dangerous waste management specialist.
- 2.5.1 Job description follows: See Attachment 3
- 2.6 All Tool Room staff (Maintenance Laborers) assigned to Street Maintenance work at either the Charles Street, Haller Lake or West Seattle yards and are often required to assist with management of dangerous wastes. As such, they must be thoroughly trained in the procedures in this plan through on-the-job training by the Haz Mat Warehouser or a designated dangerous waste management specialist.
- 2-6.1 Job description follows:

See Attachment 4

- 2-7 All Interim or Temporary Warehousers can be called upon to assist with handling dangerous wastes and must be trained in the procedures in this plan through on-the-job training by the Haz Mat Warehouser or the designated dangerous waste management specialist.
- 2.7.1 Job description and education requirements are the same as for regular full-time Warehousers.

2.8 Dangerous Waste Management Training Records

Names, training received (formal classroom/on-the-job), SED training, etc., will be kept on file in the Inventory Office. See the Warehouse Supervisor for access to those Files.

#### **Section 3**

### **Hazard Communication Program**

- 3-1 History and Purpose In 1984 the Washington State legislature passed the Worker Right To Know Act, requiring employers to provide employees and the general public with information regarding hazardous substances in the workplace. To ensure that information about the hazards of all chemicals used by the Seattle Engineering Department, Transportation Division, are known by all affected employees and that information concerning their hazards is transmitted to all affected employees, the following Hazardous Information Program has been established.
- 3.2 Statement of Policy Pursuant to the law, the Washington Administrative Code (WAC) 296-62-054, requires employers to establish and implement a Hazard Communication Program. This written Hazard Communication Program is established for the Engineering Department, Transportation Division, and encompasses all work sites of the division. The program consists of the following elements:
- Preparation of a written program, with copies to all employees.
- Inventory of all chemical products in the workplace.
- Labeling of hazardous chemical substances
- Material Safety Data Sheets (MSDS) available to all employees
- Training in proper use, handling, storage and disposal of hazardous substances.

#### 3.3 Definitions

- Hazardous substance: any substance or material in gas, solid or liquid form which is used, stored or produced by the division and which when inhaled, ingested or absorbed through the skin, could cause illness or injury.
- Health Hazard: includes any chemical for which significant evidence has been established, based on at least one study conducted by established procedures and principles, proving that acute or chronic health effects May occur in exposed employees. These health hazard chemicals include carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers hepatotoxins, neurotoxins, nephrotoxins. agents which act on the hematopoietic system, and agents which damage the lungs, skin, eyes, or mucous membrane.

- Physical hazards: a chemical for which there is scientifically valid evidence that is a combustible liquid, a compressed gas, explosive, pyrophoric, unstable (reactive) or water reactive.
- Inventory: a list of the hazardous chemicals known to be present using an identity that is referenced on the MSDS.
- Label: any written, printed or graphic material displayed on or affixed to containers of hazardous chemicals.
- Material Safety Data Sheet (MSDS): a specifically designed document (usually prepared by the manufacturer) describing hazardous substances and containing information relative to identity, physical and chemical characteristics, known health effects, exposure limits, carcinogenic properties, measures, emergency and first aid procedures and the identity of the organization which prepared the MSDS.
- 3.4 Inventory of Chemical Products A representative from each section will conduct an inventory of all hazardous chemicals- The inventory will include the following information: chemical or product name as listed on the MSDS, manufacturers name and phone number, MSDS date, hazardous ingredients, location of material and quantity in stock.

The inventory list will be placed in the notebook with the corresponding MSDS and located at each work section's MSDS station. All items purchased that contain hazardous ingredients must be accompanied by an MSDS- Materials that are put into storage will be entered into the inventory and the MSDS retained in the MSDS notebook. Supervisors in each section are responsible for maintaining an accurate inventory and MSDS notebook. Copies of all new MSDS's must be forwarded to Jerry Davenport c/o 1010 Warehouse (3861209), for entry into the master file.

A master list of all products stocked in SED warehouses with the corresponding MSDS reference number follows:

- 3.5 Labeling of Hazardous Chemical Substances Inventory/Warehouse will verify that all containers received for use will be clearly labeled as to the contents, the appropriate hazard warning and list the name and address of the manufacturer upon receipt. Section supervisors are responsible for verifying labeling requirements for materials purchased outside of the warehouse. They will also ensure that all secondary containers are labeled with either an extra copy of the manufacturer's label or with generic labels which have a block for identity and blocks for the hazard warning (available from the warehouse). For help with labeling requirements, contact the Safety Office (386-1203) or Jerry Davenport (386-1209).
- 3.6 Material Safety Data Sheets Copies of MSDS's for all hazardous chemical will be kept in the Inventory/Warehouse office- In addition, MSDS-s for site-specific materials are located in notebooks at MSDS stations. If you do not know the location of the MSDS notebook, contact your supervisor. The supervisor or their designated hazardous materials coordinator will update inventory lists when materials are added or subtracted from the inventory. Copies of all changes must be forwarded to Jerry Davenport. The supervisor will hold materials purchased without MSDS available at the distributor until the manufacturer can be contacted and the MSDS is received. Most manufacturers can send the MSDS by FAX machine- For help in obtaining or reviewing MSDS's, contact the Safety Office or Jerry Davenport.

- 3-7 Training The Safety Officer is responsible for the Transportation Division training program. He will ensure all program elements specified below are carried out. Prior to starting work, each new employee in the Transportation Division will attend a health and safety orientation that includes the following information and training:
- An overview of the requirements contained in the Hazard Communication Standard
- Hazardous chemicals present at his/her workplace
- Physical and health risks of the hazardous chemicals
- Symptoms of overexposure
- How to determine the presence or release of hazardous chemicals in his/her work area
- How to reduce or prevent exposure to hazardous chemicals through use of control procedures, work practices and personal protective equipment
- Steps Transportation Division has taken to reduce or prevent exposure to hazardous chemicals
- Procedures to follow if employees are overexposed to hazardous chemicals
- How to read labels and review MSDS-s to obtain information
- Location of the MSDS file and written Hazard Communication Program

Prior to introducing a new chemical hazard into any section of the Transportation Division, each employee in that section will be given information and training as outlined above.

3.8 Hazardous Non-Routine Tasks - Periodically, employees are required to perform hazardous non-routine tasks. One example of a non-routine task in confined space entry. Prior to starting work on such projects, each affected employee will be given information by their supervisor about the hazardous chemicals he or she may encounter during such activity. The in-formation will include specific chemical hazards, protective safety measures the employee can use and steps the division is using to reduce the hazards, including ventilation, respirators, presence of another employee and emergency procedures.

#### **Section 4**

### **Accumulation of Dangerous Wastes**

4-1 A dangerous waste is any chemical product or material used by SED carrying a label with the words "Warning," "Caution, or "Danger," which is no longer usable. Any discarded product issued by Warehouse staff which carries a green Hazardous Substance sticker is also a dangerous or hazardous waste. Unknown, unusable products are to be treated as dangerous waste. As a general rule, if in doubt, consider it hazardous or dangerous until you can find out otherwise.

- 4.2 Receival Records It is the responsibility of the staff person receiving or arranging for the disposal of department generated dangerous wastes to obtain the following information:
- The time and date the waste was received
- The section which generated the waste (i-e. Asphalt, Bridge, DWU), location (Charles Street, Haller Lake or West Seattle) and the section supervisor's name
- The exact identity, chemical name or mixture of the waste (i-e. Norline Paint Thinner, Acetone, or Diesel/Asphalt Tac Mixture)
- The dangerous waste characteristic:
- ignitable: a liquid with a flash point below 140 degrees F (60 degrees C)
- Corrosive: able to dissolve or erode materials, usually aqueous with a pH less than 2 or greater than 12.5
- Reactive: reacts violently with water or is normally unstablev(crnides, sulfides, explosives
- Toxic: high concentrations of heavy metals or specific pesticides (see Toxicity Characteristics List at the end of this section)
- The quantity received by weight or volume
- If waste is liquid, solid, sludge or gas
- The size and type of container received in
- If waste is in original product container
- The SED Hazardous Substance number (the HW 0 off the green Inventory sticker)
- The Charge Numbers for handling and disposing of the waste (or the phone number of the person who can provide that information)

This information is to be written on a Haz Mat Packing Slip and will accompany the waste as long as it is being stored.

- 4.2.1 A copy of any MSDS available for the wastes should be kept with the Haz Mat Packing Slip.
- 4-2.2 The Haz Mat Packing Slip currently in use will be updated to reflect the above requirements.
- 4-3 The Inventory/Warehouse is not a Department of Ecology regulated dangerous waste storage site. As a general rule then, dangerous wastes can be stored no longer than 90 days- There can be exceptions. However, due to the complexity of the requirements, only the Haz Mat Warehouser or the otherwise designated dangerous waste management specialist can make that determination.
- 4.4 All dangerous waste containment shall be done according to the following procedures:

- 4.4.1 The accumulation area is to be conspicuously identified as a dangerous waste storage area. Staff are to use signs, barricades, cones, barricade tape or whatever is necessary to keep unauthorized persons from entering the area
- 4.4-2 All containers and drums are to be stored within a containment system to prevent leaks or spills. The Warehouse stocks the following items for containment purposes:
- 5 gallon plastic and steel buckets with lids
- 20 gallon spill kit/salvage drum
- 55 gallon open head and closed head drums
- 85 gallon overpack drums
- Waste collection center to hold two 55 gallon drums (has a cover with a lock)
- Waste collection center that holds four 55 gallon drums
- 4-4.3 Whenever possible, leave wastes in original, properly labeled product containers (see Section 4-4.6 for proper labeling requirements). If the waste cannot be kept in its original product container because of leaking, severe rusting or apparent structural defects, then it must be stored in a container appropriate for its composition and volume. The new container is then to be labeled according to Section 4.4.6 of this plan. If the old container still holds more than one inch of waste or more than one percent of the total capacity of the container, it then becomes dangerous waste and must be managed accordingly.
- 4-4-4 Containers or drums will not be opened, handled or stored in such a way as to cause the container to leak or rupture.
- 4.4.5 Incompatible wastes will be stored in a way that will not allow them to come into contact with each other. They will not be stored in the same drum and not within the same containment system.
- 4.4.6 All dangerous waste containers or drums will be labeled with the following:
- The date waste is first put into the container
- The dangerous waste characteristic (ignitable, reactive, corrosive or toxic)
- Known constituents
- A completed "Hazardous Waste Sticker"
- If an unknown, what the suspected dangers are and that it is a "Dangerous Waste Pending Analysis"
- 4.4.7 Dangerous wastes that are ignitable or reactive must be stored in a manner equivalent with Article 79 of the Uniformed Fire Code (a copy of the UFC is kept on file in the Warehouse Office). Non-sparking wrenches and tools will be used when ignitable liquid wastes are stored in steel drums. As well, all drums

containing ignitable wastes will be grounded and staff will ensure that evaporation of the waste does not occur by making sure that all lids and bungs are securely tightened.

- 4-4.8 The mixing of any dangerous waste with any other product (such as a neutralizer or solidifier), waste or chemical, other than absorbent materials, will not be done by any warehouse staff except a thoroughly knowledgeable and trained Haz Mat Warehouser.
- 4-4.9 The accumulation/storage area will be checked **daily** to ensure that the containment and labeling guidelines in this plan are being met- A daily inspection log will be kept and any corrective actions taken will be noted in the log.
- 4.5 The transporting of any amount of dangerous waste by SED employees on any public thoroughfare can be done only if the following requirements are met:
- SED applies to and receives permission from the State Department of Ecology to become a licensed hazardous waste transporter
- The driver is properly licensed and holds, at the minimum, a Class C commercial driver's license with hazardous materials endorsement
- All Department of Transportation regulations regarding placarding and proper shipping papers are adhered to
- 4-5.1 Trained warehouse/tool room staff should only move dangerous wastes while preparing it for pick-up from a licensed disposal contractor and only so long as it remains on city or department property.
- 4.6 Unknown wastes in containers or drums should be considered dangerous waste and will be handled according to the management practices in this plan- At this writing, the abandoned waste handling guidelines are being rewritten and will be included here when completed.

\*\*\*\*\*\*\*INSERT ABANDONED WASTE HANDLING GUIDELINES HERE\*\*\*\*

#### **Section 5**

### **Sampling Dangerous Wastes**

5.1 Sampling of any dangerous wastes for laboratory analysis will only be done by a properly trained hazardous materials warehouser or environmental field specialist. At this time, samples are generally taken by the hazardous waste disposal contractor because there is no one on the Inventory staff qualified to draw samples. If this changes, then sampling procedures will be developed

**Section 6** 

6.1 Inventory oversees dangerous waste disposal and subsequent record keeping for five permanent disposal sites and several .. one time only" (like waste clean ups) sites. Each SED location has been issued a Generator ID number by the State Department of Ecology. The sites and Generator ID Numbers are as follows:

Charles Street		
1010 8th Av S	WAD	981768765
Haller Lake	WAD	988505137
Sunny Jim	WAD	988508156
Meter Repair Shop	WAD	981768765

- 6.2 The City of Seattle has several "B" contracts with properly licensed dangerous waste management, testing, transporting and disposal companies. Those vendors are:
- 6-2.1 Burlington Environmental, Incorporated, Contract Number B 99676. Contact Laura Kennedy Gould, 6548125 or Jana Auni, 654-8123. BEI can handle all aspects of testing, transporting and disposal.
- 6.2.2 Sound Analytical Services, Incorporated, Contract Number B99245, does sampling and analysis of known and unknown liquids and solids to identify hazardous or dangerous waste materials. 922-2310.
- 6.2.3 Olympus Environmental has no contract with the City but is subcontracted through Sound Analytical for emergency spill response and abandoned dangerous waste management and sampling services- Contact Aaron Aldeson, 854-5094, then Sound Analytical.
- A generator waste material profile sheet will be developed for each waste stream prior to being picked up for disposal. This is usually done by BEI and will contain a profile number, physical description and composition of the waste, its characteristics (ignitable, corrosive, reactive), and its dangerous waste numbers (such as F003 or WT02). The waste profile sheet is to be kept along with all other records concerning the waste in order to fill out Generator Annual Reports at the end of the year
- 6.4 If the waste to be disposed of is of unknown composition or if the MSDS cannot provide the information needed to dispose of the material, then BEI will need to take samples to determine disposal options. The resultant Chain Of Custody form becomes part of the record keeping requirement.
- 6-5 All wastes to be picked up by the dangerous waste disposal company shall be listed with the subsequent amount, volume or weight on a Hazardous Waste Manifest.
- 6.5.1 The manifest will also be numbered and will include the EPA and state dangerous waste numbers (taken from the waste profile) for each waste listed.
- 6.5-2 BEI usually provides these forms and will fill them out as the waste is picked up.
- 6.5.3 The signature of a knowledgeable SED representative will be required (all information on the manifest is the responsibility of the generator, not the disposal company)
- 6.5.4 The vendor will then give SED a copy of the manifest marked "Generator's Copy." Within 45 days, the vendor must return the top copy marked "Original- Return to Generator," to show that the waste was received at

the disposal site. Notify the Department of Ecology if the "Original" is not returned within 45 days. The invoice will not be processed until the "Original" is returned.

- 6.6 At the end of each year, all records relating to dangerous waste disposal will be assembled to facilitate completing of the Annual Dangerous Waste Report for each site with a Generator ID number. Annual Reports must be completed and mailed back to the Department of Ecology no later than March 1 of the following year.
- 6.7 All records relating to the accumulation, sampling or testing and disposal of dangerous wastes are to be kept on file at Inventory indefinitely. At any given time, all records for the current year and the four preceding year-must be easily accessible. Records older than five years may be put into storage in clearly marked boxes.

Samples of Profile Sheets, Chain of Custody Forms, and hazardous Waste Manifests Go Here -

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GENERATOR SITE IN	FORMATION					B. MAIL INVOICES TO:	•
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# Chain of Custody/ Laboratory Analysis Request



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Ī		UNIFORM HAZARDOUS  WASTE MANIFEST  1. Generator's US E	168 765	Manifest Document No. 81493	2. Page	not requir	ed by Fed			
		3. Generator's Name and Mailing Address City of Seather	Engineering Dypt Avenus South			Manifest Pocum	reputed by	וריו יואר מכונה וויוופי שו		
		4. Generator's Phone (206) 386-1242 Seatte, W	8. State Generator's ID 11 set a company of tent.  Substitute the company of the following information of the company of the following information of the company of the							
-	$\prod$	5. Transporter 1 Company Name 6.	US EPA ID No			e Transporter's ID		CHOTABORS		
- 1		Klsource kelovery 11	WADUW 672			sporter's Phone		225-71XX		
	Ш	7. Transporter 2 Company Name 8.	US EPA ID No	mber		e Transporter's ID	27. A 173 Lts	and the second of the second o		
	H		UE 504 10 M					' 1		
- 1	11	Designated Facility Name and Site Address     Burlington Environmental, Inc.	• •		O <sub>tt</sub> State	Facility's ID	4 Sulu (	From Brud 2:		
	$\parallel$	Ø5734 Sa. Lucile St. Seattle, WA (206) 762-3362 ☐ 1701 Alexander Tacama, WA (206) 838-4774	WAD 000812		H. Facili	ity's Phone	a 19 parties	CONTRACTOR LOCAL		
	$\parallel$	20245 77th Ave. South Kent, WA (206) 872-8030	WAD 991281	767	٠. ـ		1:-3:	36 21		
	11	11. US DOT Description (Including Proper Shipping Name, Hazard Class	s, and ID Numberi	12. Cont		13.	14.	1 d. Georgialor's		
		HM		No.	Туре	Total Quantity	Unit Wt/Vol	Waste No. ""		
٠,٠	+	. Ra, Huzardous Wask, Solid, 1	1.0,5, (bush-			( ()	$\alpha$	0007 0008		
4	+	My Chromater Methyl Etypt Kelones	WHY NA 3077	,	UM	100		DOS, WEOL		
-	+	100 11 100 100 100 100 100 100 100 100	Real Plans		-			WOLDTON		
	GEZE	k Ketore, Actore), 3, UN 1993, PG I	I I CINY CIVY	10	On	300	<b>/-</b>	0001,0007,0008 0008,0035,7003 FOUS,WA ,WW Z		
٠	R A T O R	RQ, Wask Paint (Tolune, Actor	<b>L)</b>	8	D M	300	6	0001,1007,1008 0035,4461. WAD WIDZ		
		d. CINETA MARKET SCASS	- 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1			:		dispertut Etertimal men — fl mace Ulan or any name and o Continuation St.		
		2. "Additional Descriptions for Materials Listed Above it him & 5 88 12 10 55 C-0 M Bath M 25 12 12 10 10 15 18 18 19 19 19 19 19 19 19 19 19 19 19 19 19	SUDMI-BULL	designated to in	ss no fact fed the	Programme and Site Adviewing and Branch and	schip Na nomo sn. Manifest try mailin	ini 2, Devignatori F. Ilini the company i		
		15. Special Handling Instructions and Additional Information  DOT Emergency Response Guillet a  Confificulty of Disposed Regulard within R  GENERATOR EMERGENCY TELEPHONE (1206)7162-3367	131 b) 27 odays of rea	c) 260 Lipt of fin	al CI	of (per	contr	ract)		
	$\ $	16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of	this consignment are fully an	d accurately describe	d above l	by proper shipping no	me and a	re classified, packed,		
		marked, and labeled, and are in all respects in proper condition for transport by  If I am a large quantity generator, I certify that I have a program in economically practicable and that I have selected the practicable metho  threat to human health and the environment; OR, if I am a small quar waste management method that is available to me and that I can afford.	place to reduce the volute and of treatment, statage, t	me and taxicity of or disposal currently	waste ge availabl	nerated to the deg e to me which mini	ree 1 have mizes the	present and future		
	1	Printed/Typed Name IMARY FOCEY	Signature	Valey	·			09 14 23		
	I	17. Transporter 1 Acknowledgement of Receipt of Materials								
	RANSPORT	Printed/Typed Name Jim A Rouse	Signature	Senia	lle	cest		2 V4 2>		
	P	18. Transporter 2 Acknowledgement of Receipt of Materials	18:	<del></del>				ionih Day Year		
	E		Signature				1	.		
	F	19. Discrepancy Indication Space deleted Line a)", added to line c	_		2c	to reflect	ada	ution		
	ACTU	PYPROVED BY: Many Foley 2:11 20. Facility Owner or Operator: Certification of receipt of Assardous	Opm 9/23/9 materials covered by this		as noted	in Item 19.		· · · · · · · · · · · · · · · · · · ·		
	1	Ristad/Turad Name	Sinnatura 1	71				Aonth Day Year		
	1	Printed Typed Name Both Award	A M	the Co	wa	d	<u>اء                                     </u>	91/4193		
	€ 6	PA Form 8700-22 (Rev. 9-88) Previous editions are obsolete.		صلا ا				HDC		